

EXHIBIT - 1

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10 **UNITED STATES DISTRICT COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**

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13 IN RE: SOCIAL MEDIA
14 ADOLESCENT
15 ADDICTION/PERSONAL INJURY
16 PRODUCTS LIABILITY LITIGATION

Case No. 4:22-MD-03047-YGR

MDL No. 3047

17
18 This Document Relates to:

19
20 ALL SCHOOL DISTRICT ACTIONS

**[PROPOSED] STIPULATED
IMPLEMENTATION ORDER
GOVERNING SCHOOL DISTRICT
PLAINTIFF FACT SHEET AND
SUPPLEMENTAL PLAINTIFF FACT
SHEET**

21 **I. APPLICABILITY AND SCOPE OF ORDER**

22 1. This Implementation Order (“Order”) applies only to School District Plaintiffs and
23 sets forth the procedures for the exchange of the School District Plaintiff Fact Sheet and
24 Supplemental School District Plaintiff Fact Sheet.

25 2. The Parties met and conferred and received guidance from the Honorable Carolyn
26 B. Kuhl, Judge of the Superior Court of the State of California, County of Los Angeles and agreed
27 that the School District Plaintiff Fact Sheet (SD-PFS) attached as **Exhibit A** and Supplemental
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School District Plaintiff Fact Sheet (SUP-SD-PFS) attached as **Exhibit B** should be adopted for use in this MDL.

3. The Parties have further agreed that the requirements below should be adopted for the implementation of the SD-PFS and the SUP-SD-PFS in this MDL.

II. THE SD-PFS AND SUP-SD-PFS FORM(S)

4. Each School District Plaintiff in any action filed in or transferred to this MDL must complete and serve verified, written responses to the SD-PFS (attached as **Exhibit A**) and SUP-SD-PFS (attached as **Exhibit B**), together with any responsive documents. Every School District Plaintiff is required to provide an SD-PFS and a SUP-SD-PFS that are substantially complete in all respects.

5. For the SD-PFS and the SUP-SD-PFS to be “substantially complete,” the responding School District Plaintiff must: (a) answer the questions contained in the SD-PFS and the SUP-SD-PFS to the best of their ability, and (2) provide all applicable responsive documents.

III. SERVICE AND TIMING OF THE SD-PFS AND SUP-SD-PFS AND RELATED MATERIALS

6. The deadlines for service of verified written responses together with any document for the SD-PFS and SUP-SD-PFS are as follows:

	SD-PFS DEADLINE	SUP-SD PFS DEADLINE	
A School District Plaintiff whose case was on file or transferred to this MDL as of the date this Order was entered	April 1, 2024	Bellwether School District June 1, 2024	Non-Bellwether School District October 1, 2024
A School District Plaintiff whose case was filed or transferred to this MDL after the date this Order was entered	No later than 90 days of their case being filed or transferred to this MDL, whichever is later	Same as SD-PFS (No later than 90 days of their case being filed or transferred to this MDL, whichever is later)	

1 **IV. TRANSMISSION OF PFS AND OTHER DOCUMENTS TO DEFENDANTS**

2 7. To complete and serve the SD-PFS and the SUP-SD-PFS, the Parties have agreed
3 to utilize the online “MDL Centrality” platform provided by BrownGreer PLC and accessible at
4 MDLCentrality.com. All questions regarding the use of MDL Centrality should be directed to
5 MDLCentrality@browngreer.com.

6 8. With the exception of objections for privilege, each School District Plaintiff shall
7 submit and serve the SD-PFS and the SUP-SD-PFS, together with all applicable appendices and
8 any responsive documents, without objection, by submission to MDL Centrality.

9 9. Responses to the questions contained in the PFS shall be treated as verified
10 responses to interrogatories and, where documents are requested, they shall be treated as responses
11 to requests for production of documents under the Federal Rules of Civil Procedure. All responses
12 will be governed by the standards applicable to written discovery responses under the Federal Rules
13 of Civil Procedure. If a School District Plaintiff’s case is selected for additional case-specific
14 discovery, the School District Plaintiff must timely supplement or correct the SD-PFS and the SUP-
15 SD PFS in accordance with Federal Rule of Civil Procedure 26(e).

16 10. The information that each School District Plaintiff must provide pursuant to this
17 Order, including completing, submitting, and serving an SD-PFS and a SUP-SD-PFS and
18 responsive documents, is without prejudice to Defendants’ right to propound or seek additional
19 non-duplicative discovery in the future, and nothing in the SD-PFS or the SUP-SD-PFS shall be
20 deemed to limit the scope of that discovery, including any inquiry at any deposition. Neither the
21 SD-PFS nor the SUP-SD-PFS shall count against the numeric limits for written discovery in the
22 School District cases set by Magistrate Judge Kang.

23 **V. DEFICIENCY DISPUTE RESOLUTION**

24 11. If a School District Plaintiff has not served a substantially complete SD-PFS and
25 SUP-SD-PFS as defined in Paragraph 5, Defendants may send a Notice of Deficiency via MDL
26 Centrality that identifies the alleged deficiencies. If Defendants elect to send a Notice of Deficiency,
27 Defendants shall serve the Notice of Deficiency within sixty (60) days of receipt of the SD-PFS or
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1 SUP-SD-PFS.

2 12. Following receipt of the Notice of Deficiency, School District Plaintiffs shall have
3 thirty (30) days to jointly meet and confer with Defendants regarding the perceived deficiencies
4 and possible resolution by amendment to the SD-PFS and SUP-SD-PFS or the submission of
5 additional documents.

6 13. Notwithstanding the foregoing language, Defendants reserve the right to seek (after
7 meeting and conferring with Plaintiffs' Lead Counsel and the Plaintiffs' Co-Chair of the Local
8 Government Entity Committee) Court intervention if Plaintiffs do not serve substantially complete
9 SD-PFSs on April 1, 2024, to permit the meaningful completion of bellwether selection on April
10 15, 2024.

11 14. The parties will meet and confer over a deficiency process for School District cases
12 filed or transferred to this MDL after the date this Order is entered.

13 **VI. CONFIDENTIALITY**

14 15. Information provided pursuant to an SD-PFS and SUP-SD-PFS is deemed
15 confidential and will be subject to the terms of the Protective Order entered in this MDL.
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VII. ADMISSIBILITY OF EVIDENCE

16. The Federal Rules of Evidence shall govern the admissibility of information contained in the SD-PFS and SUP-SD-PFS. Nothing in the SD-PFS and SUP-SD-PFS or this Order shall be deemed to limit the admissibility of evidence during this proceeding, including at trial. This paragraph does not prohibit a Party from withholding or redacting information based upon a recognized privilege. Documents withheld on the basis of privilege shall be logged consistent with the Federal Rules of Civil Procedure and any applicable orders of this Court except that a School District Plaintiff is not required to log privileged communications occurring after the date Plaintiff retained counsel between the Plaintiff and their counsel. The Plaintiff is also not required to log drafts of the SD-PFS and SUP-SD-PFS.

IT IS SO ORDERED,

Dated: _____, 2024

Yvonne Gonzalez Rogers
United States District Judge

EXHIBIT - A

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

Case No. 4:22-MD-03047-YGR

MDL No. 3047

This Document Relates to:

**PLAINTIFF FACT SHEET – SCHOOL
DISTRICTS**

[Insert case name and number]

INSTRUCTIONS

Use of this fact sheet. Each school-district plaintiff that has filed a complaint in this action must complete this Plaintiff Fact Sheet. If more than one school district is a plaintiff on a single complaint, each individual school district must submit its own individual Plaintiff Fact Sheet. This Plaintiff Fact Sheet constitutes discovery responses subject to the Federal Rules of Civil Procedure. The information provided will only be used for purposes related to this litigation and may be disclosed only as permitted by the Protective Order entered in this litigation.

Terms used. “You,” “your,” “Plaintiff,” and “School District” as used throughout this fact sheet refers to the school district completing this form. “Social media” refers to Defendants’ social media platforms as described in your complaint.

Certification. In completing this Plaintiff Fact Sheet, you are representing that you are an authorized representative of the school district bringing the lawsuit. You must certify under oath that the information is true and correct to the best of your knowledge, information, and belief.

Instructions regarding requests for information. Do not leave any questions unanswered or blank; if you cannot recall all of the information requested, provide as much information as you can. You should insert additional space where necessary to answer the questions completely. You should consult with your attorney about completing this form. None of the requests are designed to require an expert evaluation or limit expert testimony. None of the requests are designed to require review of individual student records.

Instructions regarding document requests. For each question calling for the production of documents, indicate whether you possess any existing documents responsive to the request. A request will indicate where it only requires that you produce information that has already been compiled and/or exists in report, survey, analysis, study, or other document that provides an overview of or describes the indicated topic. If information has not been compiled or summarized on these topics, it does not need to be located, described, or produced for the purposes of this Plaintiff Fact Sheet. For example, you are not required to locate, compile, sort, describe or produce underlying records that might show, for example, the prevalence of student use of social media or expenses incurred to address problems arising from student use of social media; however, you are required to produce existing reports, surveys, analyses, studies, or other overviews on that topic.

To determine whether you have any responsive documents, you are required to investigate whether you have the information sought. This investigation might involve a district employee asking the appropriate person at each school to provide the district with documents or reports responsive to the requests. You do not need to create any new documents.

If you do possess any such documents, reports, surveys, analyses, studies, or other overview documents, then provide copies as they are kept in the ordinary course of business, without identifying any student-specific data.

I. CASE INFORMATION

1. Plaintiff: _____
2. Name of the court in which the complaint was initially filed: _____
3. Case number in court in which complaint was originally filed: _____
4. Filing date of the complaint: _____
5. Named defendants in the complaint: _____

6. Name, firm, and e-mail address of the principal attorney(s) representing Plaintiff:

II. REPRESENTATIVE CAPACITY

For purposes of Section II (Representative Capacity) “you” refers to the person filling out this form. When you complete the rest of this form “you,” “your,” “Plaintiff,” and “School District” refers to the School District Plaintiff named in this action, including any departments, divisions, agents, and/or employees.

7. Name of individual(s) completing this Fact Sheet: _____

8. Role within Plaintiff's organization: _____

III. SCHOOL DISTRICT DATA

9. Provide the total number of schools in your district at each level (i.e. elementary school, middle school, high school, and other) from the 2017-2018 school year to present or the year for which data is most currently available:

Year	Level	Number of Schools
2023-2024	Elementary School	
	Middle School	
	High School	
	Other	
2022-2023	Elementary School	
	Middle School	
	High School	
	Other	
2021-2022	Elementary School	
	Middle School	
	High School	
	Other	
2020-2021	Elementary School	

	Middle School	
	High School	
	Other	
2019-2020	Elementary School	
	Middle School	
	High School	
	Other	
2018-2019	Elementary School	
	Middle School	
	High School	
	Other	
2017-2018	Elementary School	
	Middle School	
	High School	
	Other	

10. Provide the total number of students enrolled in your district, and the student population at each level (i.e., elementary, middle, high school, or other) from 2017-2018 to present or to the year for which data is most currently available:

Year	Level	Number of Schools
2023-2024	District-Wide	
	Elementary School	
	Middle School	
	High School	
	Other	
2022-2023	District-Wide	
	Elementary School	
	Middle School	
	High School	
	Other	
2021-2022	District-Wide	
	Elementary School	
	Middle School	
	High School	
	Other	
2020-2021	District-Wide	
	Elementary School	

	Middle School	
	High School	
	Other	
2019-2020	District-Wide	
	Elementary School	
	Middle School	
	High School	
	Other	
2018-2019	District-Wide	
	Elementary School	
	Middle School	
	High School	
	Other	
2017-2018	District-Wide	
	Elementary School	
	Middle School	
	High School	
	Other	

11. Provide the total number of district employees from 2017-2018 to present or to the year for which data is most currently available (specified as Full Time Equivalents (“FTE”) if available):

Year	Number of Employees
2023-2024	
2022-2023	
2021-2022	
2020-2021	
2019-2020	
2018-2019	
2017-2018	

12. Provide the total number of teachers employed by your district from 2017-2018 to present or to the year for which data is most currently available (specified as FTE if available):

Year	Number of Teachers
2023-2024	
2022-2023	
2021-2022	
2020-2021	
2019-2020	
2018-2019	

2017-2018	
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13. Provide the total number of on-campus health care workers (e.g., social workers, nurses, psychologists, psychiatrists, counselors, etc.) employed by the district from 2017-2018 to present or to the year for which data is most currently available (specified as FTE if available):

Year	Number of On-Campus Health Care Workers
2023-2024	
2022-2023	
2021-2022	
2020-2021	
2019-2020	
2018-2019	
2017-2018	

14. Provide the total number of off-campus health care workers (e.g., social workers, nurses, psychologists, psychiatrists, counselors, etc.) employed by the district from 2017-2018 to present or to the year for which data is most currently available (specified as FTE if available):

Year	Number of Off-Campus Health Care Workers
2023-2024	
2022-2023	

2021-2022	
2020-2021	
2019-2020	
2018-2019	
2017-2018	

15. Other than health care workers identified above, does the district have other employees who provide mental health services? **If yes**, provide the total number of such employees from 2017-2018 to present or to the year for which data is most currently available and their positions (specified as FTE if available):

Year	Number of Employees	Positions
2023-2024		
2022-2023		
2021-2022		
2020-2021		
2019-2020		
2018-2019		
2017-2018		

16. Provide the total number of health care workers (e.g., social workers, nurses, psychologists, psychiatrists, counselors) employed by the district whose primary responsibilities include addressing student mental health issues from 2017-2018 to present or to the year for which data is most currently available and their positions (specified as FTE if available):

Year	Number of Employees	Positions
2023-2024		
2022-2023		
2021-2022		
2020-2021		
2019-2020		
2018-2019		
2017-2018		

17. Does your district maintain organizational charts depicting the district's general organizational structure?

___ Yes ___ No

If yes, please provide a copy of the organizational chart(s) for the most recent year it is available.

IV. PEOPLE WITH KNOWLEDGE

18. Identify the superintendent(s), vice/assistant superintendent(s), director of student and family services, director of school health and/or safety, director of technology, and chief financial officer/head of finance, or the individuals in equivalent positions, in your district from 2017-2018 school year to the present:

19. To the extent not listed above, identify the person(s), including their title/position, at the district level whose primary responsibility was the district's budget, funding, or grant procurement efforts from the 2017-2018 school year to the present:

20. Identify the person(s), including their title/position, in your district most knowledgeable about student use of social media on school property and the impact of such use on your district from the 2017-2018 school year to the present:

21. To the extent not listed above, identify the person(s), including their title/position, in your district most knowledgeable about student mental health issues from the 2017-2018 school year to the present:

V. DAMAGES

22. State generally in what way or how you claim you have been damaged by each defendant's alleged acts at issue in this lawsuit and approximately when that injury began.

23. Are you seeking any monetary damages?

___ Yes ___ No

If yes, identify each category of damages or monetary relief that you allege.

24. Are you seeking injunctive relief other than abatement?

___ Yes ___ No

If yes, provide a general description of the injunctive relief sought.

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9 25. Are you seeking abatement (e.g. forward looking relief to address the problem, including
10 continuation of existing programs, expansion of some or all of those programs, and/or
11 creation of new programs)?

12 ____ Yes ____ No

13 **If yes, provide a general description of the abatement sought.**
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21 26. Do you possess any existing report, survey, analysis, study or other document that provides
22 an overview of or describes known expenditures and anticipated future expenditures made
23 by your District, related to youth mental health?

24 ____ Yes ____ No

25 If yes, provide a copy and identify the documents(s) responsive to this question.

26 27. Do you possess any existing report, survey, analysis, study or other document that provides
27 an overview of or describes known costs incurred or damages sought as a result of any
28 harms to your district which you attribute to social media?

____ Yes ____ No

If yes, provide a copy and identify document(s) responsive to this question.

VI. INTERACTIONS WITH DEFENDANTS

28. Have you, any schools in your district, or any affiliated organization (i.e., a parent-teacher association) communicated with any of the Defendants regarding students' use of social media? Note: This question is limited to individuals authorized to speak on behalf of the district or school and is not meant to include marketing or routine customer service correspondence, e.g., account registration, password resets, help desk questions, or the district's use of Defendants' platforms for communicating with third parties.

☐ Yes ☐ No

If yes, please describe the timeframe and general nature of the communications.

29. Have you been involved in any other litigation against any social media company? For purposes of this question, "social media company" refers to any Defendant in this litigation and/or any other social media company not named in the Complaint.

☐ Yes ☐ No

If yes, for each lawsuit, state (1) the court in which the lawsuit was filed; (2) the case name; (3) the civil action or docket number assigned to the lawsuit; and (4) your involvement or claims in the lawsuit.

30. Has your district incorporated the use of any of Defendants' platforms in its curriculum since the 2017-2018 school year?

☐ Yes ☐ No

If yes, please generally describe and identify which platform(s).

31. Have you received any grant, donation, or other funding from any of the Defendants?

☐ Yes ☐ No

If yes, describe generally the grant/donation/funding, state the approximate date of receipt, and identify which Defendant it came from.

VII. SCHOOL POLICIES FOR ELECTRONIC DEVICES, INTERNET, AND SOCIAL MEDIA USE

32. Has the district drafted or implemented any disciplinary codes, policies, or codes of conduct that address students' use of the internet or social media on school property from the 2017-2018 school year to present?

☐ Yes ☐ No

If yes, attach copies of the relevant codes or policies.

33. Has the district drafted or implemented any disciplinary codes, policies, or codes of conduct that address students' use of the internet or social media off school property from the 2017-2018 school year to present?

☐ Yes ☐ No

If yes, attach copies of the relevant codes or policies.

34. Has the district drafted or implemented any disciplinary codes, policies, or codes of conduct that address teachers' use of the internet or social media on school property from the 2017-2018 school year to present?

☐ Yes ☐ No

If yes, attach copies of the relevant codes or policies.

35. Has the district drafted or implemented any disciplinary codes, policies, or codes of conduct that address teachers' use of the internet or social media off school property from the 2017-2018 school year to present?

☐ Yes ☐ No

If yes, attach copies of the relevant codes or policies.

36. Has the district drafted or implemented any disciplinary codes, policies, or codes of conduct that address students' use of electronic devices, e.g., cell phones, on school property from the 2017-2018 school year to present?

☐ Yes ☐ No

If yes, attach copies of the relevant codes or policies.

37. Has your district ever had a policy and/or program whereby students are issued tablets, laptops, or similar devices for students' use in the course of the school year for educational purposes?

☐ Yes ☐ No

If yes, please provide the policy since the 2017-2018 school year or generally describe the policy and/or program, including material changes since the 2017-2018 school year.

VIII. SOCIAL-MEDIA AND MENTAL HEALTH SERVICES AND PROGRAMS

38. Describe the portion of your student body receiving mental health services in your district and how it has changed over time since the 2017-2018 school year, including approximate numbers and percentages if available in any existing report, survey, analysis, study or other document that provides an overview of or describes student mental health services. Note: This question is not designed to require review of underlying individual student records.

39. Have you formally proposed, formed, or participated in any district-wide task force, other program, or group to address issues related to social media use or youth mental health among students?

___ Yes ___ No

If yes, identify the name of any such program(s), what aspects of student social media use and/or mental health were addressed, and the approximate dates of the district's participation in the task force, group, or program.

40. Have you formally proposed, formed, or participated in any district-wide task force, other program, or group to address behavioral issues, bullying, absences, substance abuse, mobile device use, addiction, and/or vaping?

___ Yes ___ No

If yes, identify the name of any such program(s), what student issues were addressed, and the approximate dates of the district's participation in the task force, group, or program.

41. Has your district provided trainings for employees on how to address student mental health issues relating to social media?

___ Yes ___ No

If yes, please generally describe what types of trainings were offered by your district, when they were offered, whether attendance at the trainings was mandatory or optional, and the categories of employees at the district that were required to attend.

42. Does your district use or provide any materials to students, parents, teachers, or staff regarding the potential risks or adverse effects of using electronic devices, the internet and/or social media?

___ Yes ___ No

If yes, provide a copy and identify the document(s) responsive to this question.

IX. INCIDENCE OF OTHER TRAUMATIC EVENTS

43. Was your district ever closed to in-person learning during the COVID-19 pandemic?

___ Yes ___ No

If yes, please generally describe when schools were closed, when remote learning was offered, and when students came back to in-person learning.

Please also provide any written district-wide policies implementing remote learning.

X. FINANCIAL INFORMATION

44. Provide the district's overall budget for each year from the 2017-2018 school year to the present.

Year	Overall Budget
2023-2024	
2022-2023	

2021-2022	
2020-2021	
2019-2020	
2018-2019	
2017-2018	

45. What is the approximate annual amount budgeted for health services in the district, if separately budgeted/itemized? Has that amount increased or decreased by more than 20% since the 2017-2018 school year?

___ Yes ___ No

If yes, please describe.

46. What is the approximate annual amount budgeted for mental health services in the district, if separately budgeted/itemized? Has that amount increased or decreased by more than 20% since the 2017-2018 school year?

___ Yes ___ No

If yes, please describe.

XI. DOCUMENTS RELATING TO MENTAL HEALTH, SOCIAL MEDIA USE, OTHER EVENTS, AND EXPENDITURES

A. Prevalence

47. Do you possess any existing report, survey, analysis, study or other document that provides an overview of or describes the prevalence of or number of students with reported mental health issues in your district and the possible causes of those issue?

___ Yes ___ No

If yes, provide a copy and identify the document(s) responsive to this question.

48. Do you possess any existing report, survey, analysis, study or other document that provides an overview of or describes the prevalence of the harms associated with student social media use in your district, including associated mental health issues and classroom disruption?

___ Yes ___ No

If yes, provide a copy and identify the document(s) responsive to this question.

49. Do you possess any existing report, survey, analysis, study or other document that provides an overview of or describes the prevalence of students in the district receiving mental health services through the district?

___ Yes ___ No

If yes, provide a copy (should include students at each level if part of the document(s)) and identify the document(s) responsive to this question.

50. Do you possess any existing report, survey, analysis, study or other document that provides an overview of or describes the prevalence of social media use in your district and/or the impact of social media use in your district?

___ Yes ___ No

If yes, provide a copy and identify the document(s) responsive to this question.

51. Do you possess any existing report, survey, analysis, study or other document that provides an overview of or describes traumatic events, i.e. school shooting, violence at school by a non-student or non-staff members, or threats of violence?

___ Yes ___ No

If yes, provide a copy and identify the document(s) responsive to this question.

52. Do you possess any existing report, survey, analysis, study or other document that provides an overview of or describes attempted or completed suicides among staff or students?

___ Yes ___ No

If yes, provide a copy and identify the document(s) responsive to this question

B. Discipline measures

53. Do you possess any existing report, survey, analysis, study or other document that provides an overview of or describes interventions, discipline, or other consequences imposed on students for using social media on school premises?

___ Yes ___ No

If yes, provide a copy and identify the document(s) responsive to this question.

54. Do you possess any existing report, survey, analysis, study or other document that provides an overview of or describes disciplinary issues among students in your district, possible causes of those issues, and any interventions and/or consequences imposed?

___ Yes ___ No

If yes, provide a copy and identify the document(s) responsive to this question.

CERTIFICATION

I have made reasonable inquiries to answer the foregoing questions. Based on my personal knowledge and the information provided by other district employees, I declare under penalty of perjury that the information provided in this Plaintiff Fact Sheet is complete, true, and correct to the best of my knowledge and information, and that I have provided all of the requested documents that are reasonably accessible to me and/or my attorneys, to the best of my knowledge.

Signature

Date

Name (Printed)

Title

EXHIBIT - B

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

Case No. 4:22-MD-03047-YGR

MDL No. 3047

This Document Relates to:

[Insert Case Name and Number]

**PLAINTIFF FACT SHEET – SCHOOL
DISTRICTS**

(SUPPLEMENTAL)

INSTRUCTIONS

Use of this fact sheet. Each school-district plaintiff that has filed a complaint in this action must complete this Plaintiff Fact Sheet. If more than one school district is a plaintiff on a single complaint, each individual school district must submit its own individual Plaintiff Fact Sheet. This Plaintiff Fact Sheet constitutes discovery responses subject to the Federal Rules of Civil Procedure. The information provided will only be used for purposes related to this litigation and may be disclosed only as permitted by the Protective Order entered in this litigation.

Terms used. “You,” “your,” “Plaintiff,” and “School District” as used throughout this fact sheet refers to the school district completing this form. “Social media” refers to Defendants’ social media platforms as described in your complaint.

Certification. In completing this Plaintiff Fact Sheet, you are representing that you are an authorized representative of the school district bringing the lawsuit. You must certify under oath that the information is true and correct to the best of your knowledge, information, and belief.

Instructions regarding requests for information. Do not leave any questions unanswered or blank; if you cannot recall all of the information requested, provide as much information as you can. You should insert additional space where necessary to answer the questions completely. You should consult with your attorney about completing this form. None of the requests are designed to require an expert evaluation or limit expert testimony. None of the requests are designed to require review of individual student records.

Instructions regarding document requests. For each question calling for the production of documents, indicate whether you possess any existing documents responsive to the request. A request will indicate where it only requires that you produce information that has already been compiled and/or exists in report, survey, analysis, study, or other document that provides an

overview of or describes the indicated topic. If information has not been compiled or summarized on these topics, it does not need to be located, described, or produced for the purposes of this Plaintiff Fact Sheet. For example, you are not required to locate, compile, sort, describe or produce underlying records that might show, for example, the prevalence of student use of social media or expenses incurred to address problems arising from student use of social media; however, you are required to produce existing reports, surveys, analyses, studies, or other overviews on that topic.

To determine whether you have any responsive documents, you are required to investigate whether you have the information sought. This investigation might involve a district employee asking the appropriate person at each school to provide the district with documents or reports responsive to the requests. You do not need to create any new documents.

If you do possess any such documents, reports, surveys, analyses, studies, or other overview documents, then provide copies as they are kept in the ordinary course of business, without identifying any student-specific data.

I. CASE INFORMATION

1. Plaintiff: _____
2. Name of the court in which the complaint was initially filed:

3. Case number in court in which complaint was originally filed:

4. Filing date of the complaint: _____
5. Named defendants in the complaint: _____
6. Name, firm, and e-mail address of the principal attorney(s) representing Plaintiff:

II. SUPPLEMENTAL QUESTIONS

7. Identify, if separately itemized/tracked, and describe known expenditures and anticipated future expenditures made by your district, related to mental health and indicate whether you are seeking to recover the expense. Note: This question is not designed to require an expert evaluation or limit expert testimony.

8. Identify, if separately itemized/tracked, and describe known costs incurred or damages sought as a result of any harms to your district which you attribute to social media. Note: This question is not designed to require an expert evaluation or limit expert testimony.

9. Provide the number of students in your district referred for mental health services, if such referrals are tracked. Note: This question is not designed to require review of underlying individual student records.

Year	Number of Students
2023-2024	
2022-2023	
2021-2022	
2020-2021	
2019-2020	

2018-2019	
2017-2018	

10. Identify the number of and location of any school shooting, whether you attribute any such incident to social media use, and if so, which social media platform(s).

11. Identify the number of and location of any other violence perpetrated by an outsider (i.e. non-student and non-staff member) which required a cessation of school activities for the entire district or an entire school campus, whether you attribute any such incident to social media use, and if so, which social media platform(s).

12. Describe the frequency of threats of violence to any of your schools (e.g. threat of school shooting or bomb scare) which required a cessation of school activities for the entire district or an entire school campus and were known to students, whether you attribute any such incident to social media use, and if so, which social media platform(s).

13. Identify the number of staff or student suicides which your district reported to an outside entity and which were known to the student body, whether you attribute any such incident to social media use, and if so, which social media platform(s):

14. Identify the number of staff or student attempted suicides which your district reported to an outside entity and which were known to the student body, whether you attribute any such incident to social media use, and if so, which social media platform.

CERTIFICATION

I have made reasonable inquiries to answer the foregoing questions. Based on my personal knowledge and the information provided by other district employees, I declare under penalty of perjury that the information provided in this Plaintiff Fact Sheet is complete, true, and correct to the best of my knowledge and information, and that I have provided all of the requested documents that are reasonably accessible to me and/or my attorneys, to the best of my knowledge.

Signature	Date
Name (Printed)	Title